

REMARKS

Applicant's representative thanks Examiner Mahmoudi for granting a telephonic interview on January 21, 2004 to discuss the outstanding Office Action in this case. In the Office Action mailed November 17, 2003 claims 1–18 were rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,484,149 to *Jammes et al* in view of U.S. Patent No. 6,560,591 to *Memmott et al*. In addition, claims 19–26 were rejected under 35 U.S.C. § 103(a) over *Jammes* in view of *Memmott* and further in view of U.S. Patent No. 6,115,705 to *Larson*.

Claims 1, 8, 19 and 22 are amended to include that the selected query lookup table is selected from among other query lookup tables containing queries formatted for other databases. Support for the amendment can be found, among other places, in the specification at page 7, lines 1–16. No new matter is added by the amendment and claims 1–26 remain pending in the application. Reconsideration and withdrawal of the rejections are respectfully requested in view of the amendment and remarks that follow.

A. Rejection of Claims 1–18 Under 35 U.S.C. § 103(a) is Addressed.

Claims 1–18 were rejected under 35 U.S.C. §103(a) over *Jammes* in view of *Memmott*. The rejection is respectfully traversed.

Claim 1, as amended, recites:

the data interface function selects the query lookup table from among other query look tables containing queries formatted for other databases.

Neither *Jammes* nor *Memmott* (alone or in combination) suggest that a database interface function select one query lookup table from a set of lookup tables by matching the format of the queries in the lookup table with the query format of the target database. As noted before, *Jammes* lacks any mention of a query lookup table for any purpose, and even states “query interfaces are not within the scope of this invention and will not be further discussed.” See *Jammes*, col. 8, lines 57–59.

Memcott makes a single mention of a lookup table (col. 5, lines 14–17), but that lookup table does not store queries and has a completely different function than the query lookup table of the present invention. The lookup table in *Memcott* is used to select a database priority list based on a query characteristic. See *Memcott*, col. 5, lines 11–17. The lookup table stores database priority lists, not queries, and does not even use an actual query to select a database priority list. Moreover, the lookup table is described in *Memcott* as an inferior alternative to other kinds of decision structures for selecting database priority lists because it consumes much more storage area. See *id.* Thus, not only does the lookup table in *Memcott* lack queries, it's described as an inferior alternative for storing and searching information.

Jammes and *Memcott* do not even suggest using a lookup table to store queries, and certainly do not suggest the presence of multiple query lookup tables where one query lookup table is selected by matching the format of the queries in that lookup table with the query format of the database to be queried. Thus, for at least this reason, claim 1, and claims 2–7 (which depend from claim 1) are allowable over *Jammes* and *Memcott*.

Claim 8 includes a first and second query lookup table containing queries formatted in accordance with a first and second database, respectively, and now further recites:

in response to one of said data access requests issued to one of said databases, the database interface function selects the query lookup table containing the queries formatted in accordance with the database.

Like amended claim 1, there is nothing in *Jammes* or *Memcott* (alone or in combination) that suggests the selection of query lookup table is based on the query format used by the queried database. Accordingly, claim 8, and claims 9–12 (which depend from claim 8) are allowable over *Jammes* and *Memcott*.

Finally, claim 13 recites “a query lookup table containing queries” where “queries are formatted in accordance with the syntax required by the

database.” This element of claim 13 is not described or suggested by *Jammes* and *Memcott*. As noted above, *Jammes* fails even to mention a query lookup table. At most, the store management control 306 shown in Fig. 3 of *Jammes* suggests that queries are stored in some undefined structure in control 306. There is no suggestion, however, that the queries are stored in a lookup table. Furthermore, even if the queries were stored in a lookup table, they are not formatted in accordance with the syntax required by the database, because web server 106 has to translate the query with translate query routine 356 into a form suitable for product database 116. See *Jammes*, Fig. 3 and col. 18, line 66 to col. 19, line 7. Thus, if anything, *Jammes* teaches away from storing queries in a query lookup table that are “formatted in accordance with the syntax required by the database.”

Memcott does not remedy the fact that *Jammes* teaches away from storing queries formatted in accordance with the syntax required by the database in a query lookup table. As noted above, *Memcott* only makes a single mention of a lookup table, which does not even contain queries. Thus, one of skill in the art would have no motivation to combine *Memcott* with *Jammes* to make the query lookup table of the present invention. Accordingly, claim 13, and claims 14–18 (which depend from claim 13) are allowable over *Jammes* and *Memcott*.

In summary, *Jammes* and *Memcott* lack every element of claims 1, 8 and 13. Claims 2–7, 9–12 and 14–18, which depend from claims 1, 8 and 13, respectively, include all their limitations as well. Accordingly, withdrawal of the rejection of claims 1–18 under 35 U.S.C. § 103(a) over *Jammes* in view of *Memcott* is respectfully requested.

B. Rejection of Claim 19–26 Under 35 U.S.C. § 103(a) is Addressed.

Claims 19–26 were rejected under 35 U.S.C § 103(a) over *Jammes* in view of *Memcott*, and further in view of *Larson*. The rejection is respectfully traversed for at least the reasons noted above.

Claims 19 and 22, as amended, recite:

selecting the query lookup table containing the queries formatted in accordance with the database from among other query lookup tables containing queries formatted for other databases.

Neither *Jammes* nor *Memcott* include selecting one query lookup table from a set of lookup tables by matching the format of the queries in the lookup table with the query format of the target database, and *Larson* does not remedy this deficiency. Claims 20–21, and 23–26 depend from claims 19 and 22, respectively, and include all their limitations. Accordingly, withdrawal of the rejection of claims 19–26 under 35 U.S.C. § 103(a) over *Jammes* in view of *Memcott*, and further in view of *Larson* is respectfully requested.

C. Conclusion

In view of all of the above, claims 1–26 are believed to be allowable and the case in condition for allowance, which action is respectfully requested. Should the Examiner be of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner is requested to contact our office at the telephone number listed below.

No fee is believed to be required by this response. Should any additional fees be required, please charge Deposit Account 50-1123. Should any extension of time be required, please consider this a petition therefore and charge the required fee to Deposit Account 50-1123.

Respectfully submitted,

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